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8 **UNITED STATES DISTRICT COURT**
9 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
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11 IN RE: SOCIAL MEDIA ADOLESCENT
12 ADDICTION/PERSONAL INJURY
13 PRODUCTS LIABILITY LITIGATION

MDL No. 3047

Case Nos.: 4:22-md-03047-YGR-PHK

14 THIS DOCUMENT RELATES TO:
15 ALL ACTIONS
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**[PROPOSED] ORDER RE JOINT
DISCOVERY LETTER BRIEF ON
WHETHER YOUTUBE MUST
PRODUCE DOCUMENTS
REGARDING ITS CORPORATE
STRUCTURE AND HISTORICAL
VERSIONS OF POLICIES
CONCERNING ITS COMPLAINT
PROCESS (DKT. 1305)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

Pursuant to oral argument heard during the Court's November 21, 2024 Discovery Management Conference, the Court hereby ORDERS the following regarding PI/SD Plaintiffs and Defendants YouTube, LLC and Google, LLC (together, "YouTube"), (collectively, the "Parties"), Joint Letter Brief on Whether YouTube Must Produce Documents Regarding its Corporate Structure and Historical Versions of Policies Concerning its Complaint Process (Dkt. 1305).

1) With respect to RFP No. 62:

a) As to the portion of the request that seeks crisis management policies for responding to investigations, lawsuits, and media inquiries regarding the safety of minors, including documents explicitly discussing said policies, YouTube is directed to serve a supplemental response stating that no responsive non-privileged crisis management policies exist, if accurate based on YouTube's reasonable investigation. YouTube is otherwise directed to produce non-privileged responsive policies.

i) To the extent responsive documents have already been produced, YouTube is directed to identify by production date the productions containing policies responsive to RFP No. 62.

b) As to the portion of the request which seeks documents showing the methods of communication regarding crisis management, the Parties are directed to further meet and confer.

2) With respect to RFP No. 69, YouTube is directed to serve a supplemental response stating that there are no responsive policies describing how the general compensation policies previously produced should be applied to the teams responsible for youth safety in particular, if accurate based on YouTube's reasonable investigation. YouTube is otherwise directed to produce such non-privileged responsive policies.

3) With respect to RFP Nos. 71, 72, 76 and 79, to the extent responsive policies have already been produced, YouTube is directed to identify by production date the productions containing policies responsive to RFP Nos. 71-72, 76, and 79. Plaintiffs may reasonably request historical versions of specific policies produced in response to these requests and

for which such historical versions are relevant and proportional to the needs of the case.

The parties are directed to meet and confer in response to any such reasonable request.

- 4) As to each request, to the extent YouTube withholds any responsive document on the basis of any claim of privilege, YouTube must log those documents in accordance with the Privilege Log Protocol (Dkt. No. 740).

IT IS SO ORDERED

DATED: _____, 2024

Hon. Peter H. Kang
United States District Court Magistrate Judge

DATED: December 27, 2024

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ATTESTATION

I, Ellyn Hurd, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 27, 2024

By: /s/ Ellyn Hurd
Ellyn Hurd